



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

BDM:KKO
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 7, 2019

By ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Raniere, et al.*
Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufs:

The government respectfully writes in response to the letter filed by counsel for defendant Keith Raniere on November 6, 2019. (Docket Entry (“DE”) #810). Raniere has chosen not to further explain “the facts and evidence submitted with his Petition.” (*Id.*). Nor has Raniere offered any arguments in opposition to the government’s presentation of the applicable law and facts in its motion to dismiss. (DE #801).

Despite having been afforded the opportunity to file a substantive submission, Raniere has neither attempted to meet the pleading requirements of 18 U.S.C. § 1963(l)(3), nor offered any argument as to why his failure to do so is not fatal to his Petition. The government therefore respectfully requests that the Court grant the government’s motion and dismiss Raniere’s Petition for failure to state a claim. Thank you for Your Honor’s consideration of this submission.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

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Cc: Counsel of Record (by ECF)